

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

MEGALOMEDIA, INC., *et al.*,

Plaintiffs,

V.

PHILADELPHIA INDEMNITY
INSURANCE COMPANY,

Defendant.

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Civil Action No. 4:20-cv-01644

UNOPPOSED MOTION TO WITHDRAW AND OPPOSED MOTION FOR STAY
PENDING SUBSTITUTION OF COUNSEL

The law firm of Scott Douglass & McConnico, by counsel Steve McConnico, Santosh Aravind, and Anthony Arguijo (“SD&M”) move to withdraw as counsel of record for Plaintiffs Megalomedia, Inc., Megalomedia Studios, LLC, Mansfield Films, LLC, and DBA Holdings, LLC (together, “Megalomedia”).

UNOPPOSED MOTION TO WITHDRAW

On September 20, 2024, the Fifth Circuit Court of Appeals remanded this case to the district court to conduct jurisdictional discovery.

SD&M currently represents Megalomedia in this matter under a written agreement. Megalomedia has not met the financial terms of that written agreement. As a result, and consistent with the Texas Disciplinary Rules of Professional Conduct, SD&M seeks to withdraw as counsel for Megalomedia in this matter. Pursuant to Texas Disciplinary Rules of Professional Conduct 1.15(b)(5)-(6), good cause exists for SD&M’s withdrawal from this matter. This request is made not for delay, but so that justice will be done.

Megalomedia consents to SD&M's withdrawal in this matter. Defendant Philadelphia Indemnity Insurance Company ("Philadelphia") does not oppose SD&M's withdrawal in this matter.

Megalomedia's address is 5300 Bee Cave Road, West Lake Hills, TX 78746. Its phone number is 512-347-9901. An email address for future service is jon@megalomedia.com.

OPPOSED MOTION FOR STAY PENDING SUBSTITUTION OF COUNSEL

To date, Megalomedia has not obtained new counsel. Accordingly, SD&M respectfully requests that the Court stay the status conference set for October 25, 2024 for a period of sixty days to allow Megalomedia to obtain new counsel. In the event that the Court intends to have the status conference go forward on October 25, 2024, SD&M respectfully requests that the status conference be converted into a telephonic status conference. Philadelphia opposes the request for a stay but does not oppose the request to convert the October 25, 2024 conference into a telephonic one.

CONCLUSION AND PRAYER

SD&M's withdrawal is proper here because Megalomedia has not met its financial obligations. Accordingly, Steve McConnico, Santosh Aravind, Anthony Arguijo, and Scott Douglass & McConnico LLP respectfully request that this Court enter an order granting them leave to withdraw from this cause for all purposes, and granting all such other relief to which they are entitled.

Dated: October 21, 2024

Respectfully submitted,

By: /s/Santosh Aravind
Steve McConnico (attorney-in-charge)
smcconnico@scottdoug.com
Texas Bar No. 13450300
S.D. Texas No. 2879
Santosh Aravind
saravind@scottdoug.com
Texas Bar No. 24095052
S.D. Texas No. 2887372
Anthony Arguijo
aarguijo@scottdoug.com
Texas Bar No. 24079781
S.D. Texas No. 2147699
SCOTT DOUGLASS & McCONNICO LLP
303 Colorado Street, Suite 2400
Austin, TX 78701
(512) 495-6300
(512) 495-6399 Fax

ATTORNEYS FOR MEGALOMEDIA

CERTIFICATE OF CONFERENCE

I hereby certify that I conferred with counsel for Philadelphia regarding the relief set forth in this motion, and Philadelphia does not oppose SD&M's motion to withdraw or the request to convert the October 25, 2024 status conference into a telephonic one, but does oppose the request for a 60-day stay pending substitution of counsel for Megalomedia.

/s/Santosh Aravind

Santosh Aravind

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on counsel of record by ECF on October 21, 2024:

Stephen A. Melendi

Matthew Rigney

Grant Martin

TOLLEFSON BRADLEY MITCHELL & MELENDI, LLP

2811 McKinney Avenue, Suite 250

Dallas, Texas 75204

Telephone: 214-665-0100

Facsimile: 214-665-0199

stephenm@tbmmlaw.com

mattr@tbmmlaw.com

GrantM@tbmmlaw.com

ATTORNEYS FOR DEFENDANT
PHILADELPHIA INDEMNITY
INSURANCE CO.

/s/Santosh Aravind

Santosh Aravind